

# EXHIBIT 119

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE :  
4 UNITED STATES VIRGIN :  
ISLANDS, :

CASE NO.  
1:22-CV-10904  
-JSR

5 Plaintiff, :

6 v. :

7 JPMORGAN CHASE BANK, :  
N.A., :

8 Defendant/Third Party :  
9 Plaintiff. :

10 JPMORGAN CHASE BANK, :  
N.A., :

11 Third Party Plaintiff, :

12 v. :

13 JAMES EDWARD STALEY, :

14 Third Party Defendant. :

15 CONFIDENTIAL - ATTORNEYS' EYES ONLY

16 May 3, 2023  
17

18 Videotaped deposition  
19 of WILLIAM D. LANGFORD, taken pursuant to  
20 notice, was held at the law offices of  
Boies Schiller Flexner LLP, 55 Hudson  
21 Yards, New York, New York, and remotely,  
22 beginning at 9:37 a.m., on the above  
date, before Michelle L. Gray, a  
Registered Professional Reporter,  
Certified Shorthand Reporter, Certified  
Realtime Reporter, and Notary Public.

23 GOLKOW LITIGATION SERVICES  
24 877.370.3377 ph| 917.591.5672  
deps@golkow.com

1 asked to provide a briefing to JPMorgan's  
2 board or a board committee that included  
3 discussion of Jeffrey Epstein?

4 A. No, I don't believe I was.

5 Q. And did you ever talk to the  
6 bank's operating committee about Jeffrey  
7 Epstein?

8 A. No, I did not.

9 Q. Do you believe -- did you  
10 believe, while you worked at JPMorgan,  
11 that JPMorgan should have continued to  
12 provide banking services and credit to  
13 Jeffrey Epstein?

14 MR. KRAUSE: Objection.

15 THE WITNESS: Sorry. Did I  
16 believe that we should not have?

17 BY MS. SINGER:

18 Q. That they should have --  
19 that JPMorgan should have provided  
20 banking services and credit to Jeffrey  
21 Epstein.

22 MR. KRAUSE: Objection.

23 THE WITNESS: My view was  
24 that we should exit Jeffrey

1 Epstein as a client.

2 BY MS. SINGER:

3 Q. Do you remember when you  
4 formed that view?

5 A. Yes.

6 Q. And when was that?

7 A. End of 2010, early 2011.

8 Q. And what prompted you to  
9 come to that opinion?

10 A. The facts and information  
11 provided by Phil and Maryanne to me.

12 Q. And by Phil and Maryanne,  
13 you mean Phil DeLuca and Maryanne Ryan?

14 A. Yes. Yes.

15 Q. We all feel like we know  
16 them too, Mr. Langford.

17 And when you say "facts and  
18 information," I think is what you said,  
19 what -- what stands out in your memory  
20 about what caused you to reach the  
21 opinion that JPMorgan should not be doing  
22 business with Jeffrey Epstein?

23 A. That he pled guilty to  
24 soliciting sex with an underage girl.

1 Epstein. I don't have patience."

2 Did you have reason to  
3 believe that McCleerey was waffling?

4 A. I don't believe so, no.

5 Q. And when you say no patience  
6 for this, was there something that had  
7 happened that had tried your patience?

8 A. Not specifically, no. Exit  
9 decisions are always a bit of a  
10 challenge, generally, in a bank. And to  
11 me it was clear what we needed to do.  
12 And McCleerey had agreed, according to  
13 Phil. And we needed to execute.

14 Q. Had an exit decision been  
15 made about Jeffrey Epstein at this point?

16 MR. KRAUSE: Objection.

17 THE WITNESS: No, I hadn't  
18 escalated it yet. We were pushing  
19 it. I had ask that this be  
20 redone, to push again, to say it's  
21 time that we exit Epstein.

22 BY MS. SINGER:

23 Q. And who had you asked?

24 A. I had pushed up through Phil